

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

| | | |
|-------------------------|---|-----------------------|
| IN RE: |) | |
| |) | |
| WENDELL EUGENE REVELS |) | Case No. 16-30316-KLP |
| ANGELICA DELORES REVELS |) | Chapter 13 |
| |) | |
| Debtors |) | |

**MOTION TO EXPEDITE HEARING ON MOTION PURSUANT TO
RULE 6004 FOR PROPOSED SALE OF REAL AND TO SHORTEN NOTICE PERIOD**

COMES NOW, the Debtor, Angelica Delores Revels, by counsel, and moves this Court to Expedite the Hearing on her Motion to Pursuant to Rule 6004 for Proposed Sale of Real Estate and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtors filed this case under Chapter 13 of the U.S. Bankruptcy Code on January 27, 2016.
2. At the time of the filing of this case, the Debtor, Wendell Eugene Revels ("Mr. Revels") was the fee simple owner of the real property known as 2700 Puckett Ct., Midlothian, VA 23112, more particularly known as

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

ALL that certain lot, piece or parcel of land, with all improvements thereon and appurtenances thereto belonging, lying and being, and situate in Clover Hill District, Chesterfield County, Virginia, and being numbered and designated as Lot 73, Block L, Resubdivision of Section D, Lake Genito Subdivision, plat of which is dated August 27, 1979, entitled "Lake Genito Resubdivision of a portion of Section "D", made by Barton-Corso & Associates, Ltd., Certified Land Surveyors, recorded January 10, 1980, in the Clerk's Office, Circuit Court, Chesterfield County, Virginia, in Plat Book 23, pages 11 through 14, also made by William J. Schmidt & Assoc., Engineers & Surveyors, dated July 4, 1974, reference to which is hereby made for a more particular description.

BEING the same real estate conveyed to Wendell E. Revels by Deed from AMR residential, LLC, dated December 15, 2005, recorded December 21, 2005, in the Clerk's Office, Circuit Court, Chesterfield County, Virginia, in Deed Book 6847, page 461. The said Wendell E. Revels died on November 30, 2019, intestate, and by List of Heirs recorded February 26, 2020 in Will Book 520, page 149, he died leaving Angelica Revels and Angela R. Baldwin as his sole heirs at law.

(the "Property").

3. Freedom Mortgage ("Freedom") is a secured creditor which holds a first mortgage on the Property.

4. The approximate payoff balance on the note secured by Freedom is \$126,241.06.

5. The assessed value of the Property is \$193,300.00.

6. Mr. Revels died in November 2019.

7. At the time of his death, Mr. Revels' did not have a will, and, in accordance with Va. Code Ann. § 64.2-200(A), the Property passed by intestate succession as follows: one-third to his widow and co-debtor, Angelica Delores Revels ("Mrs. Revels"), and two-thirds to his daughter, Angela Baldwin, who is not the daughter of Mrs. Revels.

8. Angela Baldwin and Mrs. Revels entered into a contract ("Contract") for the sale of the Property for \$160,000.00, which, upon closing of the same, will result the aforesaid mortgage releasing its respective deed of trust against the Property.

9. Two-Thirds of the proceeds from this sale, approximately \$16,500.00, will go to Angela Baldwin and one-third of the proceeds from this sale, approximately \$8,500.00, will go

to Mrs. Revels. Mrs. Revels is claiming the homestead exemption for her portion of the proceeds.

10. The closing on the sale of the Property occurred on May 14, 2020.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on her Motion to Pursuant to Rule 6004 for Proposed Sale of Real Estate, Shorten the Notice Period required for said Motion, and grant them such other and further relief as is just and proper.

Dated: May 26, 2020

ANGELICA DELORES REVELS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATION

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane
James E. Kane

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane
Counsel for Debtor

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NOTICE OF MOTION AND HEARING

The above Debtor, Angelica Delores Revels, has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Amended Motion Pursuant to Rule 6004 of the Rules of Bankruptcy Procedure to Sell Real Estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 3, 2020 at 10:00 a.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5100, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 26, 2020

ANGELICA DELORES REVELS

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
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/s/ James E. Kane
Counsel for Debtor

AMCA
P.O. Box 1235
Elmsford, NY 10523

American Medical Collection Ag
4 Westchester Plaza
Elmsford, NY 10523

Amerifinancial Solutions
PO Box 602570
Charlotte, NC 28260

Bon Secours
P.O. Box 28538
Henrico, VA 23228

Capital One
15000 Capital One Drive
Henrico, VA 23238

Capital One
P.O. Box 85520
Richmond, VA 23285

Central Credit Services
PO Box 1898
Saint Charles, MO 63302

Chase Receivables
P.O. Box 4115
Dept 1011
Concord, CA 94524

Chesterfield Fire & EMS
PO Box 1658
Chesterfield, VA 23832

Chippenham Hospital
PO Box 13620
Richmond, VA 23225

Comonwealth of VA
12304 Washington Highway
Ashland, VA 23005

Focused Recovery
9701 Metropolitan Ct., Ste. No
Richmond, VA 23236

Focused Recovery
9701 Metropolitan Ct.
Richmond, VA 23236

Focused Recovery
PO Box 63355
Charlotte, NC 28263

Focused Recovery Solutions
9701 Metropolitan Ct.
Richmond, VA 23236

Ford Motor Credit Company
PO Box 542000
Omaha, NE 68154

Ford Motor Credit Company
PO Box 54200
Tampa, NE 68754

Gilliam & Evans, PLC
PO Box 845
Chesterfield, VA 23832

Hanover County Dept of Soc Svs
12304 Washington Highway
Ashland, VA 23005

Hanover Family Physicians
9376 Atlee Station Road
Mechanicsville, VA 23116-2602

Horizon Financial Management
9980 Georgia Street
Crown Point, IN 46307

IC Systems Collections
PO Box 64378
Saint Paul, MN 55164

Loan Care Servicing Center
3637 Sentara Way
Virginia Beach, VA 23452

Mariner Finance LLC
13102 Midlothian Tnpk.
Midlothian, VA 23113

MCV Physicians
P.O. Box 91747
Richmond, VA 23291

Midland Credit Managbement Inc
P.O. Box 60578
Los Angeles, CA 90060-0578

Midland Credit Management
PO Box 60578
Los Angeles, CA 90060

MiraMed Revenue Group
991 Oak Creek Drive
Lombard, IL 60148

Montegromery Ward
3650 Mikwaukee Street
Madison, WI 53714

NIPAS, Inc.
P.O. Box 99400
Louisville, KY 40269

Ortho Virginia
7821 Ironbridge Road
Richmond, VA 23237

Prestige Financial Service
1420 S. 500 West
Salt Lake City, UT 84115

Publishers Clearinghouse
PO Box 4002936
Des Moines, IA 50340

Radiology Assoc. of Richmond
PO Box 79923
Baltimore, MD 21279

Receivable Management Systems
7206 Hull Street Road
Ste 211
Richmond, VA 23235

Richard A. Cordle, Treasurer
Chesterfield County
P.O. Box 70
Chesterfield, VA 23832

St. Francis Medical Center
PO Box 843356
Boston, MA 02284-3356

St. Francis Family Med.
7007 Harbour View Blvd.
Suffolk, VA 23435-2719

Synchrony Bank
PO Box 960061
Orlando, FL 32896

Synchrony Bank
PO Box 965005
Orlando, FL 32896

Synchrony Bank
PO Box 965036
Orlando, FL 32896

Synchrony Bank
PO Box 965024
Orlando, FL 32896

Target
P.O. Box 660170
Dallas, TX 75266

TD Bank USA/Target
3701 Wayzata Blvd.
Minneapolis, MN 55416

The Swiss Colony
1112 7th Ave.
Monroe, WI 53566

Union Bank & Trust
PO Box 940
Ruther Glen, VA 22546

United Consumers
PO Box 4466
Woodbridge, VA 22194

VCI
7202 Glen Forest Drive
Suite 200
Richmond, VA 23226

Verizon Virginia
500 Technology Drive
Suite 300
Weldon Springs, MO 63304

Virginia Family Phys, P.C
2367 Colony Crossing Place
Midlothian, VA 23112-4280

Weebank/Freshstart
6250 Ridgewood ROA
Saint Cloud, MN 56303